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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Yakov Shaakov,

Plaintiff,

v.

Experian Information Solutions, Inc., Equifax
Information Services, LLC; Timepayment Corp.,
Synchrony Financial dba SYNCB/Sam Ash Music
Freedom Financial Asset Management, LLC dba
Freedom Plus,

Defendants.

CASE NO.: 2:22-CV-001646

**STIPULATION TO EXTEND TIME
FOR DEFENDANT FREEDOM
FINANCIAL ASSET MANAGEMENT,
LLC dba FREEDOM PLUS TO FILE
RESPONSE TO COMPLAINT**

Yakov Shaakov ("Plaintiff"), by and through his counsel of record, and Defendants Freedom Financial Asset Management, LLC dba Freedom Plus ("Defendant") have agreed and stipulated to the following:

WHEREAS, on September 28, 2022, Plaintiff filed a Complaint for damages under FCRA, 15 U.S.C. section 1681. [ECF Dkt. 1].

WHEREAS, the Complaint was served on September 30, 2022.

WHEREAS, Defendant's original deadline to respond to the Complaint was October 21, 2022.

WHEREAS, Plaintiff and Defendant engaged in early discussions to evaluate the allegations and possible settlement, informally agreed to extend Defendant's deadline to respond, and now desire to further extend Defendant's deadline to respond to the Complaint for a period of two (2) weeks in order for parties to further evaluate the allegations and responses, including possible settlement discussions.

NOW, THEREFORE, the parties hereby request this Court to further extend the date for Defendant to respond to the Complaint is extended until **December 10, 2022**.

Dated this 30th day of November, 2022

HUTCHISON & STEFFEN, PLLC

/s/Michael Brooks

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Attorneys for Defendant

Freedom Financial Asset Management, LLC

Dated this 30th day of November, 2022

KIND LAW

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Attorneys for Plaintiff

Rosalina Shaakov

ORDER

Upon stipulation of the parties and for good cause appearing therefore, IT IS HEREBY ORDERED as follows:

Deadline for Defendant to respond to the Complaint is December 10, 2022.

IT IS SO ORDERED.

**NO FURTHER EXTENSIONS WILL
BE GRANTED.**

Dated: December 2, 2022


United States Magistrate Judge